

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**NOTICE OF CORRESPONDENCE REGARDING THE EIGHTY-EIGHTH OMNIBUS
OBJECTION (NON-SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO
RICO, PUERTO RICO HIGHWAYS AND TRANSPORTATION AUTHORITY, AND
EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE
COMMONWEALTH OF PUERTO RICO TO INDIVIDUAL PROOF OF CLAIM NO.
61531.**

To the Honorable United States District Judge Laura Taylor Swain:

1. On October 24, 2019, the Commonwealth of Puerto Rico (the “Commonwealth”), the Puerto Rico Highways and Transportation Authority (“HTA”), and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as the sole Title III representative of the Commonwealth, HTA and ERS (collectively, the “Debtors”) pursuant to Section 315(b) of the *Puerto Rico Oversight, Management, and Economic Stability*

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Act (“PROMESA”),² filed the Eighty-Eighth Omnibus Objection of the Commonwealth of Puerto Rico, Puerto Rico Highways and Transportation Authority, and Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Deficient Claims Asserting Interests Based on Salary Demands, Employment, or Services Provided [ECF No. 8977] (the “Eighty-Eighth Omnibus Objection”) to various proofs of claim.

2. The Eighty-Eighth Omnibus Objection seeks to disallow certain deficient claims (the “Deficient Claims”) which purport to assert liabilities arising from unspecified Puerto Rico statutes, but fail to provide critical information needed to understand what liabilities either the Commonwealth, HTA, ERS, or any other Title III Debtor may owe, such as the specific law number and year the statute was passed, or an explanation of how the identified statute gives rise to liabilities owed.

3. The Debtors received the attached correspondence from: (a) Magaly Muñiz Tirado (“Muñiz Tirado”), a copy of which is attached hereto as Exhibit “A” (the “Muñiz Tirado Response”), regarding Proof of Claim No. 61531 (the “Muñiz Tirado Claim”). A certified translation of the Muñiz Tirado Response is attached hereto as Exhibit “A-1”.

4. The Muñiz Tirado Response contains a copy of a page from the Eighty-Eighth Omnibus Objection, on which is a handwritten note stating “Received, Magaly Muñiz Tirado.” The Muñiz Tirado response does not, however, contain any additional information explaining the basis of the Muñiz Tirado Claim. The Debtors have therefore determined that the Muñiz Tirado Response still does not provide sufficient information to enable the Debtors to reconcile the Muñiz Tirado Claim. Accordingly, the Debtors respectfully request that the Court grant the Eighty-Eighth Omnibus Objection and disallow the Muñiz Tirado Claim, notwithstanding the Muñiz Tirado

² PROMESA is codified at 48 U.S.C. §§ 2101-2241.

Response.

Dated: November 11, 2020
San Juan, Puerto Rico

Respectfully submitted,

/s/ Hermann D. Bauer

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